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WRITER'S INFORMATION  
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August 31, 2005

**BY HAND DELIVERY**

Ms. Elaine Flaherty  
Docket Clerk  
Civil Clerk's Office  
U.S. District Court for the District of Massachusetts  
United States Courthouse  
One Courthouse Way  
Boston, MA 02210

Re: *In re ADC Telecommunications, Inc. ERISA Litigation,*  
Case No. 05-mc-10307-RGS

Dear Judge Stearns:

As we discussed on the telephone earlier today, please substitute the attached document for the document that we filed on Monday, August 29 as Exhibit A to the Affidavit of Andrew Holly. The attached document is the email referred to in Mr. Holly's affidavit.

Please call me if you have any questions about this matter. Thank you very much for your help.

Very truly yours,



Patrick M. Curran, Jr.

Enclosures

cc (w/ encl.): David Pastor, Esq. (by email & first class mail)  
The Honorable Richard G. Stearns (by hand)

ADC ERISA Litig.

Page 1 of 2

**Holly, Andrew**

**From:** Scott Poynter [scott@emersonpoynter.com]  
**Sent:** Monday, August 08, 2005 1:38 PM  
**To:** Klaas, Heather; 'Edward W. Chang'; 'Vander Weide, Vernon J. (E-mail)'; jmeltzer@sbclasslaw.com  
**Cc:** Lucke, Steve; Swigert, Tom; Hartman, Amy; 'Ed Ciolko'  
**Subject:** RE: ADC ERISA Litig.  
Yes, all four identified experts.

Scott E. Poynter  
Emerson Poynter LLP  
2228 Cottdale Ln., Suite 100  
Little Rock, AR 72202  
Ph. 501.907.2555  
Fx. 501.907.2556  
[www.emersonpoynter.com](http://www.emersonpoynter.com)

**From:** Klaas, Heather [mailto:Klaas.Heather@dorsey.com]  
**Sent:** Monday, August 08, 2005 12:41 PM  
**To:** Scott Poynter; Edward W. Chang; Vander Weide, Vernon J. (E-mail); jmeltzer@sbclasslaw.com  
**Cc:** Lucke, Steve; Swigert, Tom; Hartman, Amy; Ed Ciolko  
**Subject:** RE: ADC ERISA Litig.

Yes. Will that include the documents requested in the subpoena issued to Mr. White as well?

-----Original Message-----

**From:** Scott Poynter [mailto:scott@emersonpoynter.com]  
**Sent:** Monday, August 08, 2005 11:35 AM  
**To:** Klaas, Heather; 'Edward W. Chang'; 'Vander Weide, Vernon J. (E-mail)'; jmeltzer@sbclasslaw.com  
**Cc:** Lucke, Steve; Swigert, Tom; Hartman, Amy; 'Ed Ciolko'  
**Subject:** RE: ADC ERISA Litig.

Heather: To be clear on one thing, we plan on producing the expert documents by 8/15. Those documents would be responsive to your requests and subpoenas (with return dates of 8/9/05). Is that acceptable to you?

Scott E. Poynter  
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[www.emersonpoynter.com](http://www.emersonpoynter.com)

**From:** Klaas, Heather [mailto:Klaas.Heather@dorsey.com]  
**Sent:** Friday, August 05, 2005 5:05 PM  
**To:** Scott Poynter; Edward W. Chang; Vander Weide, Vernon J. (E-mail); jmeltzer@sbclasslaw.com  
**Cc:** Lucke, Steve; Swigert, Tom; Hartman, Amy  
**Subject:** ADC ERISA Litig.

Please see the attached letter regarding discovery issues.

<<Poynter Ltr.pdf>>

8/31/2005

ADC ERISA Litig.

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Fax: 612-340-2807  
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8/31/2005